



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

THE ASSISTANT SECRETARY

MAR 10 2006

Dr. Lana Seivers
Commissioner of Education
Tennessee Department of Education
6th Floor, Andrew Johnson Tower
710 James Robertson Parkway
Nashville, TN 37243-0375

Dear Dr. Seivers:

Thank you for submitting a proposal for consideration to participate in the Secretary's growth model pilot, which will allow selected States to use a growth-based accountability model to meet the goals of the No Child Left Behind Act (NCLB). Each proposal is being reviewed internally to determine how well it meets the seven core principles laid out in the Secretary's November 21, 2005 letter, making it eligible to advance to peer review.

The initial review of Tennessee's proposal indicates additional information is needed to determine how it meets the seven core principles. I remind you that an expected result from the pilot project is the ability to analyze how growth serves as a measure of accountability in comparison to the current status model. In accordance with Principle 4, such a comparison is only possible when a growth model and its growth targets are applied to all students and not only to students who missed the proficiency target. As we discussed in our March 9, 2006 phone call, please provide information to answer the following questions found in the Department's peer review guidance (please see www.ed.gov/policy/elsec/guid/growthmodelguidance.doc for that information). The reference in parenthesis is to that particular element in the guidance document:

Principle 1. Universal proficiency

- Does the state proposed growth model include a relationship between consequences and rate of student growth consistent with Section 1116 of ESEA? (Principle 1.4)
 - Has the state clearly described consequences the state/LEA will apply to schools? Do the consequences meaningfully reflect the results of student growth? (List Principle 1.4.1)
 - Please clarify the interventions facing a school or LEA that does not meet AYP under the growth model and whether they are consistent with section 1116?

Principle 2. Establishing appropriate growth targets at the student level

- Has the state proposed a technically and educationally sound method of depicting annual student growth in relation to growth targets? (Principle 2.1)

- Has the state adequately described a sound method of determining student growth over time? (Principle 2.1.1)
 - Please clarify whether the growth model projections will be re-calculated each year for each student.
 - Please clarify whether there is a gap in the scale scores (please see page 11 of the proposal).
 - Please clarify or expand upon the information provided in the technical appendix. Specifically, the following questions were raised:
 - Does the Tennessee model create any situations where two students with the same reading score in year 1 will have different growth expectations in year 2?
 - Please clarify the process and procedures for “nesting down” to the school level and explain whether different growth curves will be generated for students from different classrooms or different schools.
 - Please clarify the “average schooling experience” noted on page 17 of the proposal and how this will be accounted for in the model.
 - Please clarify what variables will be used to calculate the regression for the growth model.
 - Please clarify whether the proposed model is a covariance model, and particularly how instances of missing data will be resolved (as stated on page 12 of the proposal). Please provide further rationale for generating school-based averages and whether this is more effective than actually imputing values using an MCAR or MAR procedure.
 - Please provide additional statistical citations or empirical research that demonstrate where this model has been applied to vertically-equated assessments producing similar results to bolster the claim that vertically-aligned tests are not necessary.

Principle 4. Inclusion of all students

- Does the state’s growth model proposal address the inclusion of all students, subgroups, and schools appropriately? (Principle 4.1)
 - Does the state’s growth model proposal address the inclusion of all students appropriately (Principle 4.1.1)
 - Please clarify whether the growth model will be applied to all students in every school in the state.
 - Does the state’s growth model address the inclusion of all subgroups appropriately? (Principle 4.1.2)
 - Please clarify whether the proposal includes only the current year of data from the alternate assessment. Are additional years of data on the alternate assessment available to be included?

Principle 6. Tracking student progress

- Has the state designed and implemented a technically and educationally sound system for accurately matching student data from one year to the next? (Principle 6.1)
 - What studies have been conducted to demonstrate the percentage of students who can be “matched” between two academic years? Three years or more years? (Principle 6.1.4)
 - Please provide additional information on the match rates for two and three years for the whole population and by subgroup.

As we discussed in our March 9, 2006 phone call, please be aware that you will need to amend the Tennessee Accountability Workbook to address the formation of a separate subgroup for children displaced by Hurricane Katrina and how these children will be included in accountability determinations. The additional information you provide will be considered an addendum to Tennessee’s original application and will be included in the review process for the pilot. **The information should be submitted no later than March 17, 2006.** Please provide the information to Dr. Catherine Freeman at catherine.freeman@ed.gov.

I appreciate your interest in the growth model pilot. If you have any questions regarding this request, please contact Dr. Freeman at the email address above or by calling (202) 401-0113. I thank you in advance for your response.

Sincerely,



Henry L. Johnson

cc: Julie McCargar
Mary Reel
Cory Curl